

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 13-10017-JLT
)	
ALEXIS HIDALGO, <i>et al</i> ,)	
Defendants.)	

**UNITED STATES' SUPPLEMENTAL
BILL OF PARTICULARS FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On November 20, 2013, a federal grand jury sitting in the District of Massachusetts returned a ten-count Superseding Indictment charging thirty defendants with Conspiracy to Distribute Cocaine Base, Cocaine, Oxycodone and Marijuana, in violation of 21 U.S.C. § 846 (Count One); Distribution of Marijuana and Aiding and Abetting, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2 (Counts Two and Seven); Distribution of Cocaine Base and Aiding and Abetting, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2 (Counts Three through Six, and Count Eight); Distribution of Oxycodone and Aiding and Abetting, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2 (Count Nine); and Felon in Possession of a Firearm and Ammunition, in violation of 18 U.S.C. § 922(g)(1) (Count Ten).

The Superseding Indictment also contained two Forfeiture Allegations. The first forfeiture allegation (the Drug Forfeiture Allegation) gave the defendants notice that the United States sought forfeiture, pursuant to 21 U.S.C. § 853, upon conviction of one or more of the offenses

alleged in Counts One through Nine of the Superseding Indictment, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations, including but not limited to the following:

- a. \$18,800 in United States currency seized on or about August 24, 2012 from Jonathan DaSilva in Boston, Massachusetts.

The second forfeiture allegation (the Gun Forfeiture Allegation) gave the defendants notice that the United States sought forfeiture pursuant to 18 U.S.C. § 924(c) and 28 U.S.C. § 2461(c), upon conviction of the offense alleged in Count Ten of the Superseding Indictment, of all firearms and ammunition involved in such violation, including but not limited to the following:

- a. a Ruger P89 semiautomatic handgun bearing serial number 314-79400 and containing 10 rounds of 9 millimeter ammunition.

On January 9, 2014, the United States filed a Bill of Particulars for Forfeiture of Assets, giving notice that it is seeking forfeiture of, without limitation, the following additional specific properties:

- a. \$8,756 in United States currency seized on or about January 17, 2013, from Broadway in Malden, Massachusetts;
- b. various pieces of jewelry seized on or about January 17, 2013 from Broadway in Malden, Massachusetts;
- c. \$3,929 in United States currency seized on or about January 17, 2013, from Kennedy Drive in Malden, Massachusetts;
- d. various pieces of jewelry seized on or about January 17, 2013, from Kennedy Drive in Malden, Massachusetts;
- e. \$31,138 in United States currency seized on or about January 17, 2013, from Langdon Street in Roxbury, Massachusetts;

- f. one black 2010 Audi A4 sedan bearing vehicle identification number WAUFFAFL0AN03246;
- g. \$1,530 in United States currency seized on or about January 17, 2013, from Morris Robinson in Weymouth, Massachusetts;
- h. \$1,292 in United States currency seized on or about January 17, 2013, from John Webbe in Boston, Massachusetts;
- i. \$58 in United States currency seized on or about January 17, 2013, from Jerry Correia in Mattapan, Massachusetts;
- j. \$602 in United States currency seized on or about January 17, 2013, from Moises Figueroa in Wellesley Hills, Massachusetts.
- k. \$10, 270 in United States currency seized on or about January 17, 2013, from Maurice Barnett in Salinas, California;
- l. various gold and silver bars and coins, seized on or about January 17, 2013, from Maurice Barnett in Salinas, California; and
- m. various pieces of jewelry, seized on or about January 17, 2013, from Maurice Barnett in Salinas, California.

Pursuant to, and without limiting in any manner the Forfeiture Allegations of the Indictment, the United States hereby gives notice that it is seeking forfeiture of, without limitation, the following additional specific property, pursuant to 21 U.S.C. § 853:

- a. one white 2008 Infiniti, bearing VIN JNKBV61F08M265195 and MA registration 811SM3, seized on or about September 25, 2014 in Dorchester, Massachusetts.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Veronica M. Lei
EMILY O. CUMMINGS
JOHN A. WORTMANN, JR.
VERONICA M. LEI
B.B.O. #673122, veronica.lei@usdoj.gov
Assistant United States Attorneys
United States Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

Date: January 22, 2015

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: January 22, 2015

/s/ Veronica M. Lei
VERONICA M. LEI
Assistant United States Attorney